

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: Shaunden S Bish

Debtor,

Nationstar Mortgage LLC as servicer for  
Lakeview Loan Servicing, LLC

Movant.

v.

Shaunden S Bish

Debtor/Respondent,

Ronda J. Winnecour, Trustee  
Additional Respondent.

BANKRUPTCY CASE NUMBER  
19-22277-glt

CHAPTER 13

**RESPONSE OF NATIONSTAR MORTGAGE LLC AS SERVICER FOR LAKEVIEW  
LOAN SERVICING, LLC TO DEBTOR'S OBJECTION TO NOTICE OF MORTGAGE  
PAYMENT CHANGE FILED APRIL 20, 2023**

Nationstar Mortgage LLC as servicer for Lakeview Loan Servicing, LLC, by and through its counsel, LOGS Legal Group LLP, hereby responds to Debtor's Objection to Notice of Mortgage Payment Change filed April 20, 2023, as follows:

1. Admitted.
2. It is admitted that Debtor so consents.
3. It is admitted that Debtor so alleged.
4. Denied. The document is reduced to writing and the writing speaks for itself. Attached As Exhibit "A" is a true and correct copy of the Notice of Payment Change filed April 20, 2023.
5. Denied as stated. The Escrow analysis is reduced to writing and the writing speaks for itself.
6. It is denied that issues appear in the analysis. A true and correct copy of the Escrow Analysis is attached as Exhibit "B."
7. Denied as stated. The document is reduced to writing and the writing speaks for itself.
8. Denied as stated. The document is reduced to writing and the writing speaks for itself.

9. Denied as stated. The document is reduced to writing and the writing speaks for itself.

10. Denied as stated. The documents are reduced to writing and the writings speak for themselves.

11. Denied as stated

12. Denied as stated. The April 20, 2023 Notice is reduced to writing and the writing speaks for itself. is reduced to writing and the writing speaks for itself.

13. Denied as stated. The Proof of Claim is reduced to writing and the writing speaks for itself.

14. Respondent is without sufficient information to form a belief as to the truth or falsity of the within averment as to what Debtor considers “substantially current” in making Plan payments.

15. Denied as stated. Respondent is without sufficient information to form a belief as to Debtor’s state of mind, confused or not, and that averment, therefore, is deemed denied. The remaining averments are specifically denied.

16. Denied. The documents are reduced to writing and the writings speak for themselves. Moreover, Debtor fails to mention the two month escrow reserve permitted by the Real Estate Settlement Procedures Act.

17. Denied. Respondent is without sufficient information to form a belief as to the truth or falsity of the averment as to what Debtor “believes” and that/those averment(s) therefore are deemed denied. By way of additional response, the Notice of April 20, 2023 was/is correct. Respondent will generate a post petition payment history to support its position. The Debtor and Trustee may have copies as Debtor’s counsel requests.

WHEREFORE, Nationstar Mortgage LLC as servicer for Lakeview Loan Servicing, LLC respectfully requests that the Debtor’s Objection to Notice of Mortgage Payment Change filed April 20, 2023 be DENIED and DISMISSED.

/s/Lorraine Gazzara Doyle  
Christopher A. DeNardo 78447  
Lorraine Gazzara Doyle 34576  
LOGS Legal Group LLP  
3600 Horizon Drive, Suite 150

King of Prussia, PA 19406  
(610) 278-6800  
logsecf@logs.com

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: Shaunden S Bish

Debtor,

Nationstar Mortgage LLC as servicer for  
Lakeview Loan Servicing, LLC

Movant.

v.

Shaunden S Bish

Debtor/Respondent,

Ronda J. Winnecour, Trustee  
Additional Respondent.

BANKRUPTCY CASE NUMBER  
19-22277-glt

CHAPTER 13

**CERTIFICATE OF SERVICE**

I, Lorraine Gazzara Doyle, an employee of the law firm of LOGS Legal Group LLP hereby certify that I caused to be served true and correct copies of the foregoing by First Class Mail, postage prepaid, at the respective last known address of each person set forth below on this \_\_\_\_\_ 5th day of \_\_\_\_\_ June \_\_\_\_\_, 2023:

Shaunden S Bish  
500 St. Thomas Place  
Greensburg, PA 15601

Justin P. Schantz, Esquire, Law Care  
324 S. Maple Avenue, 2nd Floor  
Greensburg, PA 15601  
jschantz@my-lawyers.us - VIA ECF

Ronda J. Winnecour, Trustee  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219  
cmecf@chapter13trusteedpa.com - VIA ECF

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

/s/Lorraine Gazzara Doyle

Christopher A. DeNardo 78447

Lorraine Gazzara Doyle 34576

LOGS Legal Group LLP

3600 Horizon Drive, Suite 150

King of Prussia, PA 19406

(610) 278-6800

logsecf@logs.com

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: Shaunden S Bish  
Debtor,

Nationstar Mortgage LLC as servicer for  
Lakeview Loan Servicing, LLC  
Movant.

v.

Shaunden S Bish  
Debtor/Respondent,

Ronda J. Winnecour, Trustee  
Additional Respondent.

BANKRUPTCY CASE NUMBER  
19-22277-glt

CHAPTER 13

**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2023, upon consideration of the Objection to Notice of Mortgage Payment Change and Respondent Nationstar Mortgage LLC as servicer for Lakeview Loan Servicing, LLC's response thereto;

It is hereby ORDERED that Debtor's Objection to Notice of Mortgage Payment Change dated April 20, 2023 is DENIED and DISMISSED, with prejudice.

BY THE COURT:

\_\_\_\_\_  
HONORABLE GREGORY L. TADDONIO  
UNITED STATES BANKRUPTCY JUDGE